Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

September 11, 1992

Dr. Thomas E. Murley, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Attn: Document Control Desk

Subject: LaSalle County Station Units 1 and 2
Inservice Testing Program
Revised Relief Request RV-26
NRC Docket Nos. 50-373 and 50-374

References:
(a) C.M. Allen (CECo) letter to USNRC, dated July 28, 1987, Inservice Testing Program for Pumps and Valves

(b) Paul C. Shemanski (USNRC) letter to Henry E. Bliss (CECo), dated August 16, 1988, Safety Evaluation Report and Relief of the Inservice Testing Program for Pumps and Valves

(c) W.E. Morgan (CECo) letter to Dr. Murley (USNRC), dated October 2, 1989, submitting Revision 2 of the IST program

(d) M.A. Ring (USNRC) letter to Cordell Reed (CECo), dated July 29, 1992, transmitting Inspection Report 50-373/92015 and 50-374/92015

Dear Dr. Murley,

In the reference (a) submittal, Commonwealth Edison (CECo) provided the proposed IST program for LaSalle County Station. Relief request RV-26 was included in this submittal, and requested relief from the quarterly exercising frequency and the stroke timing of valves 1(2)C11-F380 and 1(2)C11-F388, the control rod drive scram discharge volume instrument vents, and 1(2)C11-F381 and 1(2)C11-F389, the control rod drive scram discharge volume instrument drains. In lieu of individually stroke timing each valve quarterly, CECo proposed alternate testing of exercising each valve quarterly, and stroke timing the slowest valve every refuel outage.

In section 4.9.1.2 of reference (b), the NRC stated that CECo had not demonstrated the impracticality of individually stroke timing each valve. In the reference (c) submittal, CECo revised the alternate testing on relief request RV-26 to include full stroke exercising of these valve quarterly, without stroke timing.

As discussed in reference (d), during an NRC IST Inspection CECo agreed to individually stroke time the scram discharge vent and drain valves on a refueling outage frequency. Attached is a revision to relief request RV-26, which clarifies that the alternate testing will be to exercise the valves quarterly without timing, and to individually stroke time the valves each refuel outage.

If there are any questions, please call this office.

Respectfully,

JoAnn Shields
Nuclear Licensing Administrator

Attachment

cc: A.B. Davis, Regional Administrator - RIII
B.L. Siegel, Project Manager - NRR
D.L. Hills, Senior Resident Inspector - LSCS
Office of Nuclear Facility Safety - IDNS

LASALLE COUNTY STATION
UNIT # 1 and 2

VALVE RELIEF REQUEST/
COLD SHUTDOWN JUSTIFICATION: RV-26
APPROVAL/REFERENCE DOCUMENT(S): SER dated August 16, 1988

AFFECTED COMPONENT(S):

COMPONENT EPN	CLASS/CATEGORY	FUNCTION
1(2)C11-F380	2/B	CRD Scram Discharge Inst Volume Vent
1(2)C11-F381	2/B	CRD Scram Discharge Inst Volume Drain
1(2)C11-F388	2/B	CRD Scram Discharge Inst Volume Vent
1(2)C11-F389	2/B	CRD Scram Discharge Inst Volume Drain

ASME SECTION XI TEST REQUIREMENT: Full Stroke and Stroke Time, Quarterly

BASIS FOR RELIEF: During reactor operation the scram discharge volume vent and drain valves operate in pairs and cannot be stroke timed with any repeatability because of the bleed valves installed in the supply (-F383) and exhaust lines (-F384), which are adjusted to control the sequencing between the upstream and downstream vent and drain valves. The -F380 and F381 (downstream) valves are adjusted to close after the -F388 and -F389 (upstream) valves during a full core scram. When the full core scram is reset, the -F380 and -F381 valves are adjusted to open after the -F388 and -F389 valves. This is designed to prevent locking in pressurized air or water between the redundant vent or drain valve.

In order to measure the individual valve stroke time a strip chart recorder(s) would need to be hooked into the electrical circuit of each valve, this in itself requires a number of man-hours because of the necessary procedural first and second verifications involved with lifting and landing leads to alleviate personnel errors. This elaborate timing set up would not provide any relevant data indicative of valve performance or condition, since the bleed rates themselves are not consistent.

Full stroking of these valves quarterly will be sufficient to adequately assess their operational readiness.

ALTERNATIVE TEST: Full stroke exercise quarterly without timing. Valves will be individually stroke timed on a refueling outage frequency.